Addendum to OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services

SBC provides below the 15 items that are the enhancements to the original POR as agreed upon with the CLECs participating in the collaborative sessions. They are represented here in the same order as they were developed and discussed during the collaborative sessions.

The CLEC participants agreed that SBC would document in an Addendum to the POR the work to be done to deploy enhancements to the existing Datagate and EDI interfaces for pre-ordering and ordering of xDSL services. The in scope items included in this Addendum are items 1, 2, 3, 8, 10, 13 and 15. Also provided is an updated SBC FMO Timeline – Release Schedule that represents the agreement on the work to be done on these items. SBC also agreed to include a statement of its position on items 4, 5, 6, 7, 9, 11, 12, and 14 which are out of scope of this merger condition and do not represent enhancements that are included in the schedule.

1) Pre-Ordering Enhancement Requests

- 1. The CLECs requested SBC to remove the planned use of a tracking number in the Loop Qualification transaction in Datagate and EDI. SBC agreed to remove this element from the planned enhancements in each SBC operating region.
- 2. The CLECs requested SBC to add a valid value instead of a blank value to signify when no data is found on a Loop Qualification transaction. SBC agreed to return a value signifying when no information is available for the requested address in Datagate and EDI in each SBC operating region.
- 3. The CLECs requested SBC to enhance the Loop Qualification transaction in Datagate and EDI to provide access to the following Loop Makeup information. SBC agreed to enhance the Loop Qualification transaction in Datagate and EDI to include this information no later than 12/2/00.
 - · Presence of repeaters
 - Location of repeaters
 - Type of repeaters
 - Quantity of repeaters
 - Type of Plant (aerial or buried)
 - Type of Loop (copper or fiber)
 - Portion that is copper or fiber
 - · Length that is copper or fiber
 - Availability of spare facilities
 - Quantity of bridged tap by occurrence
 - Location of bridged tap by occurrence

- · Quantity of Low pass filters
- Location of Low pass filters
- Quantity of Range extenders
- Location of Range extenders
- Number of gauge changes
- Location of pair gain devices
- Location of DLC
- · Quantity of DLCs
- Location of RSU (Remote Switching Unit)
- Type of RSU (Remote Switching Unit)
- Resistance Zone
- 4. SBC added a release on 4/29 for SWB/PB/NB to provide access to actual Loop Qualification information in concert with the provisions of the COVAD/Rhythms Arbitration award in Texas.
- 5. Access to actual Loop Qualification information in concert with the provisions of the UNE Remand Order was not fully know during the collaborative workshops and SBC will provide enhancement information when available via Change Management notifications. Access to this information was originally scheduled for the 12/2/00 release.

2) Ordering Enhancement Requests

The CLECs requested SBC to remove the planned use of the tracking number in the CNO field. SBC agreed to remove this element in each SBC operating region. A release was added on 4/29/00 for SWB/PB/NB to provide the Ordering enhancements originally scheduled for the 7/22/00 release. Additionally, an enhancement for flow through of Unbundled DSL capable loop requests based on Loop Qualification was added in concert with the commitments from the COVAD/Rhythms Arbitration award in Texas.

3) Mechanized Request for Flow through for Loops 12K or Less

The CLECs requested SBC to enhance the flow through capability for Unbundled DSL capable loop requests for loops of 12K feet in length or less. SBC agreed to provide this enhancement no later than 7/22/00.

4) SBC's Plan for Pricing Loop Qualification

The CLECs requested SBC to provide a response on their plans to charge for the retrieval of Loop Qualification information.

As discussed in the collaborative process, SBC plans to have separate pricing structures for mechanized loop qualification and manual loop qualification.

- The mechanized loop qualification charge will not be billed on a per transaction basis. A mechanized loop qualification charge will instead be applied when the CLEC submits a xDSL capable loop order.
- The manual loop qualification charge will be billed each time the CLEC requests that SBC perform a manual loop qualification to obtain loop make-up information not contained in SBC's mechanized databases. SBC is willing to offer two price structures for manual loop qualification if the CLECs prefer. If two prices are offered, CLECs will have the option of requesting a manual loop qualification which will provide a pre-determined subset of the available loop make-up information or a pay a higher charge for a complete set of the available manual loop qualification data.
- Cost based cost studies and proposed rates for each of the loop qualification elements will be performed and filed with the state commissions.

5) Actual Loop Length Calculation

The CLECs requested clarification on the calculation that determines actual loop length.

SBC provides the following clarification on the actual loop length description for all operating regions. Actual loop length is calculated as the length for the feeder pair (F1) to the SAI plus the length of the distribution pair (F2) to the customer's terminal.

6) Description of DLR-Like Process

The CLECs requested clarification on the reference to the DLR and DLR-like document mentioned in the POR.

SBC provided the following clarification. The reference to DLR and DLR-Like document in the Plan of Record relates to the loop makeup information that is available after the SBC service order has been issued and the loop has been assigned. In the SWB, SNET and Ameritech regions, the industry-based DLR data is available due to Unbundled DSL capable loops being designed circuits. However, for the PB/NB region, the Unbundled DSL capable loops are considered non-designed circuits and are not managed nor stored in a manner that enables the industry-based DLR to be supplied. Thus, the PB/NB region will provide a DLR-like document to supply the available loop makeup elements (e.g. binding post, cable pair, etc.) for the specific service address.

7) Clarification on Pre-Qualification Transaction in Existing Regions

The CLECs requested clarification on the availability of the Pre-Qualification transaction.

SBC provided the following clarification. The Pre-Qualification transaction will remain available in the FMO for the Datagate interface in the SWB and PB/NB regions as it exists today. As evidenced in the Pre-Ordering Enhancement item below, this transaction will be maintained and enhanced as business needs necessitate.

8) Enhancements to Pre-Qualification

The CLECs requested SBC to enhance the Pre-Qualification transaction in the SWB region for Datagate to provide 2 additional fields of information. SBC agreed to enhance the Pre-Qualification transaction in Datagate for the SWB region to include this information in the 3/18/00 release.

- Wire Center Code
- Design Cable Gauge Makeup

9) Change Management Process (CMP)

The CLECs requested SBC add a statement to the POR that addresses Change Management processes.

SBC provides the following clarification. All SBC/Ameritech regions have a regional Change Management Process ("CMP") in place. These processes provide a means by which SBC and the CLECs can work cooperatively to introduce changes to the OSS interfaces. The process includes specific intervals, such as, when release notifications are to be provided to CLECs for review and comment. SBC is committed to CMP principles to deliver the planned enhancements identified in the POR and this addendum to the POR. A 13-state CMP is currently being addressed in a separate CLEC collaborative effort. The 13-state CMP is anticipated to be approved by the CLECs and SBC in the March/April 2000 time frame. Once implemented, Ameritech will utilize this process in lieu of the current CLEC Forum process.

10) Use of the TOS Field for Res/Bus Information

The CLECs requested SBC to relent on the planned use of the Type of Service (TOS) field for the purposes of requiring a business or residence indicator on Unbundled DSL capable loop requests.

SBC provided the following clarification. The enhancement outlined in the FMO ordering process of the POR will change Ameritech's use of the SPEC field to indicate residential or business use for the UNE loop. Effective with the 12/2/00 release, Ameritech will utilize the TOS field for this residence/business indicator instead of the SPEC field. This will bring into alignment the use of the TOS field by all SBC regions and this uniformly follows the OBF guideline for requesting this information based on state municipal fees.

All SBC regions except for SWB currently require that CLECs indicate whether the loop will be used for residential or business service. SWB has plans to make use of the TOS field for this indicator on a required basis in the near future based on issues involving discounts for residential loops and state municipal fees.

11) Loop Order M&P Documentation for Datagate and EDI

The CLECs requested the development of process documentation on the SBC Websites for ordering Unbundled DSL capable loops via Datagate and EDI.

SBC provides the following clarification. SBC currently maintains four forms of documentation currently provided in several of the operating regions. Technical documentation is maintained that contains application to application data field structures and protocol mapping rules. Pre-Ordering and Ordering Usage Rules are maintained that contain data field usage rules for valid values. User Guides are maintained that provide GUI functionality. And, Handbooks/Product Guides are available that provide product and process information. SBC does not presently support process documentation that is being requested by the CLECs. SBC is more that willing to talk about this new form of documentation in the future. SBC is committed to putting in place by April 2000, CLEC User Forums that will be the appropriate vehicle to discuss this request.

During this collaborative workshop SBC encouraged the CLECs to participate in the CLEC User Forums.

12) Minutes from xDSL Forum

Individual CLEC representatives requested a copy of the meetings minutes from the xDSL meeting held in Chicago during November 1999.

SBC provided the following clarification. SBC provided minutes from this xDSL Business Needs Workshop via email delivery soon after the meetings took place. Individual CLEC representatives present in the collaborative sessions that did not receive these meeting minutes were advised of the notification process for future reference. During this collaborative session the individual CLEC representatives that did not receive meeting minutes were provided with paper copies.

13) Request to amend Ameritech Loop Qualification Specifications

The Ameritech EDI Pre-Ordering specifications for the 4/3/00 release contained parsed address fields that do not align with the concatenated address fields utilized by the existing Pre-Ordering functions. A CLEC requested Ameritech to reconsider the use of these parsed fields for this planned enhancement.

SBC provided the following response. SBC will remove the use of the parsed address fields from the specifications for this Loop Qualification enhancement. It will be more appropriate to utilize parsed address fields when Ameritech plans a release that enhances all pre-ordering functions simultaneously. The use of the existing concatenated address fields will be used in the 4/3/00 release. A new set of specifications will be released as soon as possible to reflect the use of the concatenated address fields for the Loop Qualification transaction.

14) Verification of OSS PORs

The CLECs requested clarification on the number of PORs included in the SBC/Ameritech merger conditions. The CLECs understood SBC to state on 1/19/00 that the merger conditions contained 13 PORs relating to OSSs. As a result, the CLECs requested a list of all 13 PORs.

SBC provides the following clarification. SBC stated that two additional PORs will be presented in the March timeframe that outline the enhancement steps to providing Uniform and Enhanced OSS interfaces for the SBC/Ameritech 13-state region. There was a misunderstanding when SBC mentioned these PORs. SBC provided a handout during the February 1-2 workshop that listed the <u>5</u> PORs related to OSS enhancements.

15) Line Sharing

The CLECs requested that the POR Addendum contain a statement on SBC's plans for the development and deployment of Line Sharing processes.

SBC provided the following clarification. SBC was unable to provide any specificity regarding Line Sharing in the POR because the Line Sharing Order was not published when the POR was filed on 12/7/99. The Line Sharing Order has since been published on 1/17/00 but there is very little more detail known at the time of this collaborative. On 1/25/00, SBC announced their intention to conduct a Line Sharing trial with CLECs in each of the operating regions to learn more about this business arrangement. The trial is scheduled to start on 2/25 and will run for a 60-day period. Both SBC and the CLECs recommended that Line Sharing not be included within the scope of this POR. SBC committed to provide Line Sharing specifics for pre-ordering and ordering as information becomes available via the Change Management notification processes.

Revised FMO Timeline – Release Schedule Updated from xDSL Collaborative Workshop for CLEC Requested Enhancements and State/Federal Mandates February 2, 2000

POR Timeline

POR Timeline Updated during Workshop

Date	Region	Interface	Date	Region	Interface	Enhancement
3/18/00	SWB PB/NB	Datagate	3/18/00	SWB PB/NB	Datagate	 Remove planned use of Tracking Number from the Loop Qualification inquiry/response. Enhance the Loop Qualification response to return a valid value instead of a blank value when no data is available at a specific address. Enhance the SWB Pre-Qualification transaction to return two additional fields of data – WireCenter Code and Design Cable Gauge Makeup.
4/3/00	Ameritech	EDI (Pre-ordering)	4/3/00	Ameritech	EDI (Pre-ordering)	 Enhance the Loop Qualification response to return a valid value instead of a blank value when no data is available at a specific address. Revise the EDI specifications to utilize concatenated address fields.
7/22/00	SWB PB/NB	EDI (Pre-ordering)	7/22/00	SWB PB/NB SWB PB/NB SWB	(Pre-Ordering) Datagate EDI EDI (Ordering) EDI (Flowthrough) EDI (Pre-ordering)	 Enhance EDI Pre-Ordering to include enhancements originally scheduled for 7/22/00. Remove planned use of Tracking Number from the Loop Qualification inquiry/response. Enhance the Loop Qualification response to return a valid value instead of a blank value when no data is available at a specific address. Enhance the SWB/PB/NB Loop Qualification response to return available mechanized data from backend systems originally scheduled for 12/2/00. Enhance EDI Ordering to include enhancements originally scheduled for 7/22/00. Remove planned use of Tracking Number in the CNO field. Enhance EDI Ordering Flow through for Unbundled DSL capable loops based on Loop Qualification information. Remove planned use of Tracking Number from the Loop Qualification inquiry/response.
	SNET			SWB	EDI (Flowthrough)	 Enhance the Loop Qualification response to return a valid value instead of a blank value when no data is available at a specific address. Enhance EDF Ordering Flow through for Unbundled DSL capable loops less
				PB/NB		than 12K feet based on Loop Qualification information.
12/2/00	SWB PB/NB Ameritech	EDI (Ordering)	12/2/00	SWB PB/NB SNET Ameritech	(Preordering) EDI/CORBA EDI	Enhance the Loop Qualification response to return additional fields of data requested by CLECs during collaborative workshop.
				Ameritech	EDI (Ordering)	Remove planned use of Tracking Number in the CNO field.
				Ameritech	EDI (Flowthrough)	Enhance EDI Ordering Flow through for Unbundled DSL capable loops based on Loop Qualification information.

Note: References to EDI Pre-Ordering in the SWB/PB/NB regions includes CORBA development.

Summary and Chronology of SBC's OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services

I. Background

Paragraph 15c of the SBC/Ameritech Merger Conditions approved in the Memorandum Opinion and Order released on October 8, 1999, states that

Within 14 months after the Merger Closing Date (assuming the duration of Phase 2 described

below is no longer than 30 days), SBC/Ameritech shall develop and deploy, in the SBC/Ameritech Service Area, except for the SBC/Ameritech Service Area within Connecticut, in advance of industry standards, both enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components.

- (1) Phase 1 SBC/Ameritech shall (i) complete a publicly available Plan of Record, which shall consist of an overall assessment of SBC's and Ameritech's existing Datagate and EDI interfaces, business processes and rules, hardware capabilities, data capabilities, and differences, and SBC/Ameritech's plan for developing and deploying enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components, and (ii) notify all unaffiliated telecommunications carriers that have a current interconnection agreement with SBC/Ameritech of the Plan of Record.
- (A) Not later than 3 business days after the target date, SBC/Ameritech shall file a notice regarding its satisfaction of this target with the Secretary of the Commission.
- (B) If, 90 days after the Merger Closing Date, one or more CLEC(s) has requested enhancements to SBC/Ameritech's existing Datagate or EDI interfaces that are different from what is contained in the Plan of Record, SBC/Ameritech shall immediately begin Phase 2.
- (2) Phase 2 SBC/Ameritech shall work collaboratively with CLECs, in a single series of workshop sessions (in multiple locations, if necessary), to obtain written agreement on enhancements to the existing Datagate or EDI interfaces identified in the Plan of Record, and a change management process, including a 12 month forward-looking view of process changes and deployment schedule.

On December 7, 1999, SBC submitted its OSS Plan of Record (POR) for preordering and ordering of xDSL and other advanced services to the Secretary of the Federal Communications Commission. On January 6, 2000, SBC received comments to the POR from seven CLECs, comments to the POR and requests for enhancements that were different than those outlined in the POR. On January 11, 2000, SBC provided CLECs with notification of an xDSL Collaborative Meeting to be held in Dallas, Texas on January 19, 2000. At the close of the meeting held on January 19, SBC and participating CLECs scheduled a 2-day meeting to be held February 1-2, 2000 in Dallas, Texas to conclude the xDSL collaborative workshop sessions. At the close of the sessions, enhancements had been agreed to which, together with SBC's POR, will substantially alter the methodology for pre-ordering and ordering throughout SBC.

OSS Plan of Record (POR) is designed to provide a comprehensive analysis and plan focused on the development of enhancements to Datagate and EDI for pre-ordering and EDI for ordering xDSL and other Advanced Services. SBC followed the approach described in the OSS Process Improvement Plan, which included hosting two separate DSL Business Needs Workshops in November 1999. Several CLEC recommendations were incorporated into the POR.

The POR contains a detailed review of each regional Present Method of Operation (PMO) and was undertaken to review current business rules, processes and capabilities. Also, an analysis of the existing Datagate and EDI interface capabilities was completed as well as an inventory of relevant data elements for the SBC operating regions. Through streamlining processes and integrating data gathered through the DSL Business Needs Workshops, a Future Method of Operation (FMO) was established. CLEC input and SBC's experience in the rapidly changing data business provided insight in how to enhance the xDSL pre-ordering and ordering processes.

The FMO focused on the Loop Qualification and Ordering processes. It proposed the following enhancements to those processes over a twelve-month period:

- The addition of the Loop Qualification inquiry for pre-ordering.
- 18 data fields of Loop Makeup information in the Loop Qualification inquiry.
- The use of a tracking number for ease of inquiry once the initial inquiry was performed.
- 6 fields to be utilized on the LSR form to be customized to order Unbundled DSL capable loop service.
- The releases for pre-ordering were scheduled as quickly as possible to introduce the Loop Qualification inquiry. The first releases were planned for delivery less than 180 days from the Merger Close Date.
- Actual data returned on the Loop Qualification inquiry was provided for in the first Ameritech release scheduled for April 3, 2000.
- The tracking number would be utilized in one of the ordering fields, the CNO field, to signify that a prior Loop Qualification inquiry had been performed.

 Specificity for the Unbundled DSL capable loop service would be standardized between the operating regions by the use of the 6 ordering fields.

III. Chronology

On December 7, 1999, SBC submitted its OSS Plan of Record (POR) for preordering and ordering of xDSL and other advanced services to the Secretary of the Federal Communications Commission.

On January 6, 2000, SBC received comments to the POR and requests for enhancements different than those outlined in the POR from AT&T, Birch Telecom, COVAD, MCIWorldCom, NorthPoint Communications, Rhythms and SPRINT.

On January 11, 2000, SBC provided notification of an xDSL Coffaborative Meeting to be held in Dallas, Texas on January 19, 2000.

On January 19, 2000, SBC and approximately 53 representatives from 21 CLEC companies met to begin the collaborative process. SBC also provided a conference bridge, which was utilized by one CLEC representative. No agreement was reached on the scope of SBC's development and deployment plan presented in the POR or SBC's collaborative plan to obtain written agreement on the CLEC enhancement requests to the existing Datagate or EDI interfaces. Several items were contained in the CLEC comments, that in SBC's opinion, could not be remedied by enhancements to Datagate and EDI. The parties agreed to continue the collaborative process in a 2-day workshop scheduled for February 1-2, 2000, in Dallas, Texas.

On February 1, 2000, SBC and approximately 33 participants from 16 CLEC companies met to continue the collaborative process and SBC again provided access via a conference bridge. Several individuals from the FCC audit staff joined via the conference bridge as well. The parties agreed SBC would document the agreed upon list of items in an "Addendum" to the POR, which outlines the work to be done to deploy enhancements to the existing Datagate and EDI interfaces for pre-ordering and ordering xDSL services. In addition to enhancement requests, SBC would provide a statement of its position on several items.

On February 2, 2000, SBC and approximately 30 participants from 16 CLEC companies met to continue the collaborative process and SBC again provided access via a conference bridge. SBC began the session by providing their initial responses to the list of 14 items as agreed upon on February 1, 2000. SBC provided clarification on all requests for enhancements to Datagate and EDI for the pre-ordering and ordering of xDSL services and provided the dates when

releases would occur during the upcoming 12 months. SBC also provided responses to other related subject areas raised earlier by the CLECs. These areas were UNE Remand, Spectrum Management, Aggregate Planning Data and Sample Test Data. SBC closed the collaborative workshop on February 2, 2000, by summarizing the completion of the agreed upon items.

IV. Collaborative Process

The collaborative process began on January 6, 2000, when SBC received comments and requests for enhancements, different than those outlined in the POR, from AT&T, Birch Telecom, COVAD, MCIWorldCom, NorthPoint Communications, Rhythms and SPRINT. SBC analyzed the comments and organized them into a matrix categorized into 20 subject areas. This step was done in an effort to prepare an efficient tool which could be utilized to discuss issues with the CLECs. The matrix provided for the CLEC comment/request, SBC's response, a denotation when SBC felt the comment/request was either resolved or open for more discussion.

On January 19, 2000, SBC began the meeting by reviewing the scope of the POR, reviewing the scope of the collaborative process outlined in 15c(1)(B) and 15c(2) of the SBC/Ameritech merger conditions, and presenting a plan for successful completion of the collaborative process. Successful completion was defined by SBC as obtaining written agreement on enhancements to the existing Datagate or EDI interfaces identified in the POR. SBC attempted to use the matrix of comments and enhancement requests as a facilitation tool to establish agreement on the scope of the POR, determine what was in and out of scope for the collaborative process and to answer CLEC comments. The day was spent discussing subjects such as Loop Qualification pricing, the establishment of xDSL performance measurements, OSS parity performance between CLECs and SBC affiliate companies, the establishment of standard processing intervals for the 13-state SBC enterprise and requests for the inclusion of OSS interfaces other than Datagate and EDI. SBC agreed to hold discussions on these subjects, but was unable to maintain the focus of the CLECs on the enhancement requests to Datagate and EDI for pre-ordering and EDI for ordering of xDSL services. SBC felt these subjects were beyond the areas that could be remedied by changes to the existing Datagate and EDI interfaces. No agreement was reached on the scope of SBC/Ameritech's development and deployment plan presented in the POR or SBC's collaborative plan to obtain written agreement on the CLECs enhancement requests to Datagate or EDI. The parties did agree to continue the collaborative process in a 2-day workshop scheduled for February 1-2, 2000, in Dallas, Texas.

On February 1, 2000, SBC and approximately 33 participants from 16 CLEC companies met to continue the collaborative process and SBC again provided

access via a conference bridge. Before this session began, SBC and the CLEC participants worked through issues surrounding the use of a court reporter furnished by Rhythms to take an "official" record of the meeting. No prior notice was provided by Rhythms to establish this procedure and SBC delayed the start of the session to discuss the matter with all participants. There was unanimous support by the CLEC participants for having the court reporter. The CLEC participants felt the meeting minutes from the January 19 session and the comment/request matrix were insufficient for their needs as the official record. SBC disagreed, but did agree to proceed with the session once an additional reporter provided by SBC could be arranged. Reporters for both Rhythms and SBC were set up and the session began. All parties agreed that the record taken by the reporters would be utilized as the official record.

During the beginning segment of this second workshop session, SBC presented educational information on the 5 Plans of Record associated with the SBC/Ameritech merger conditions that involve OSS enhancements (3 FCC. Illinois and Ohio). SBC also discussed the CLEC communication vehicles available for ongoing OSS notification processes and collaborative forums such as the Accessible Letter/E-mail Notification process, Change Management Process (CMP) meetings, CLEC Forum Meetings and CLEC User Forum meetings. Further, SBC presented a walk-through of the Future Method of Operation (FMO) process for mechanized pre-ordering and ordering of Unbundled DSL capable loop service. Following these presentations, SBC led more discussion focused on an effort to establish a common agreement on the scope of the POR and the collaborative process described in the Merger Conditions. After lengthy discussion, the parties agreed to disagree on the scope of the Merger Conditions as presented by SBC. The CLECs did agree however, to follow SBC's scope in an effort to move forward and facilitate the workshop toward obtaining written agreement on the work to be done based on the CLECs requests for enhancements to SBC/Ameritech's existing Datagate and EDI interfaces which were different from those contained in the POR. Following this course of action, discussion ensued on the CLEC enhancement requests to Datagate and EDI and subject areas related to SBC's POR. The parties agreed SBC would document the agreed upon list of items in an "Addendum" to the POR. In addition, statements on issues related to the Datagate and EDI enhancements were itemized between the parties and added to the list of items for the addendum. A list of 14 items were identified for all parties to work from and reach agreement. Before adjournment for the day, it was further agreed that SBC would provide their initial response to the 14 items at the beginning of the session on February 2.

On February 2, 2000, SBC and approximately 30 participants from 16 CLEC companies met to continue the collaborative process and SBC again provided access via a conference bridge. SBC began the session by providing their initial responses to the list of 14 items as agreed upon on February 1. SBC provided clarification on all requests for enhancement to Datagate and EDI and provided

dates when releases would occur in the 12-month plan ahead. SBC also provided responses to the related subject areas. Following this presentation, the parties agreed to collaborate on three remaining items. The first item involved the comment/request matrix prepared by SBC. All parties agreed this matrix was not an appropriate tool to utilize publicly in future proceedings. Second, all parties agreed to discuss a number of items from the matrix that were denoted as out of scope by SBC for the POR. These items were discussed between the parties to completion. SBC recommended on-going CLEC forums as the appropriate venue for several of the items. The third item involved the CLECs request to discuss 4 subject areas where the CLECs wanted more information or clarification of information to wit: UNE Remand, Spectrum Management, Aggregate Planning Data, and Sample Test Data. SBC considered UNE Remand and Spectrum Management to be within the scope of the POR and Aggregate Planning Data and Sample Test Data out of scope for the POR. The Sample Test Data turned out to be a request more than a subject area. Nonetheless, these subject areas were discussed to completion by the parties. A fifteenth item was added to the addendum list that would be filed with the FCC regarding Line Sharing.

V. Issues Considered To Be In Scope

During the collaborative sessions, SBC and the CLECs participants agreed to the following pre-ordering and ordering enhancements to Datagate and EDI.

Pre-ordering Enhancements

- SBC will enhance the Pre-Qualification transaction in the SWB region for Datagate to provide the Wire Center Code and the Design Cable Gauge Makeup. This enhancement will be deployed in the 3/18/00 release.
- SBC will enhance Datagate and EDI to provide access to actual data in the SWB and PB/NB regions in a 4/29/00 release. This enhancement was scheduled for 12/2/00 in the POR and will be moved to 4/29/00 to meet the conditions of the Texas COVAD/Rhythms Arbitration award.
- SBC will deploy the Loop Qualification transaction with the 18 data fields specified in the POR by enhancing Datagate and EDI. This enhancement will be deployed in all operating regions no later than 7/22/00, as scheduled.
- SBC will not utilize the tracking number originally proposed for Datagate and EDI in the POR per the CLECs' request. This process will not be deployed in any SBC operating region.
- SBC will update the Loop Qualification transaction for both Datagate and EDI to add a valid value instead of blank value to signify when no data is found for the requested address. This enhancement will be deployed in all operating regions no later than 7/22/00.

 SBC will enhance the Loop Qualification transaction in Datagate and EDI to include additional data fields requested by the CLECs. This enhancement will be deployed in all operating regions no later than 12/2/00.

Ordering Enhancements

- SBC will not utilize the tracking number process for the CNO field as originally proposed for EDI in the POR per the CLECs request. This enhancement will not be deployed in any SBC operating region. Instead, the matching of the Loop Qualification information and the Local Service Request (LSR) will utilize the address fields.
- SBC will deploy the LSR ordering enhancement in EDI as specified in the POR with the exception of the CNO field. This enhancement will be deployed in the SWB and PB/NB regions in a 4/29/00 release and in the Ameritech region in the 12/2/00 release.
- SBC will deploy a flow through enhancement for ordering Unbundled DSL capable loops in the SWB and PB/NB regions in the 4/29/00 release.
- SBC will deploy a flow through enhancement for ordering Unbundled DSL capable loops in the Ameritech region in the 12/2/00 release.
- SBC will deploy a flow through enhancement for ordering Unbundled DSL capable loops less than 12K feet in the SWB and PB/NB regions no later than 7/22/00.

UNE Remand Subject Area

This was one of the 4 subject areas for which the CLECs requested more information. All parties discussed this subject related to the pre-ordering enhancements to Datagate and EDI and access to all mechanized data through the Loop Qualification transaction. In particular, SBC discussed the plans for providing access to mechanized data in the 4/29/00 release for the SWB and PB/NB regions. SBC acknowledged that it had obligations under the UNE Remand Order that had impact on this POR and that SBC would meet those obligations.

Spectrum Management Subject Area

This was a second subject area to be considered within the scope of the POR and was discussed toward the end of the sessions. The CLECs wanted more information on the dismantling of the binder group management process. SBC stated that it would be dismantled, but all the details were not yet available. SBC suggested the CLECs ask for status via their Account Managers or in the Line Sharing Trial meetings. The CLECs also requested more information on SBC's

use of industry guidelines for Spectrum Management. SBC stated that its generic interconnect agreements would be updated on an ongoing basis with Spectrum Management changes reflective of changes in industry guidelines. Also, loop offering types that develop from the COVAD/Rhythms Arbitration award will be updated in the contracts as well. SBC confirmed that an xDSL loop can be ordered on an "as is " basis and that non-standard technology can be applied provided the non-standard technology is not prohibited.

VI. Issues Considered To Be Out Of Scope

During the collaborative sessions, SBC and the CLEC participants discussed items under the following headings that SBC considered to be outside the scope for the POR. While trying to stay on task to work through the CLECs' enhancement requests for Datagate and EDI, SBC was willing to discuss these items and provide explanations as appropriately as possible. SBC also redirected these issues to more appropriate forums when they were known.

- Standard Intervals were a discussion item that the CLECs wanted information on from an overall business perspective. SBC pointed out the information that was available in the POR pertained to the intervals associated with the Loop Qualification function. Access to Loop Qualification when available in Datagate and EDI is projected to be near real time for either designed model or actual data. Requests for a manual look up of actual data will be dependent on the time it takes Outside Plant Engineering personnel to perform the work, and varies by region. The FOC and provisioning interval times equate to standard UNE loop timeframes with an exception for requests for conditioning. Information on intervals for these functional areas are available on the operating regions web sites. SBC provided additional information during the sessions that pointed the CLECs to specific web site addresses where interval information is documented. During the sessions, CLEC participants also mentioned that they felt the POR should include information on standardized operating intervals between the regions. SBC stated that the work necessary to bring the operating regions into uniformity was still to come and would be provided via the appropriate notification methods.
- CLEC representatives wanted the POR to address parity performance measures for those OSSs provided to the CLECs and to SBC's affiliate company. Performance measures have typically been negotiated in regulatory proceedings and as such, would be out of scope for this POR process. Additionally, SBC could only respond that a near real time response time is anticipated for the Loop Qualification inquiry at this time since it is not yet in production.

- CLECs requested that the POR include electronic access to service order status. SBC stated clearly that this functionality is outside the scope of the POR. SBC provided that it had teams looking at this functionality in relation to the Uniform and Enhanced OSS POR that will be filed in the March timeframe.
- CLECs requested that the POR include SBC's plans for flow through development. While the scope of 15c did not specify SBC to provide enhancements to achieve flow through, SBC did discuss its plans relative to the ordering enhancements. This was particularly true when discussing the plans involving the COVAD/Rhythms Arbitration award.
- Pricing associated with the costs to provide Loop Qualification information
 was considered out of scope by SBC for this POR. The CLECs had
 numerous concerns regarding this issue and utilize much of the collaborative
 time here. SBC did not agree that discussion on this subject was relevant to
 the enhancements of Datagate and EDI, but agreed to provide a policy
 statement as an item to be included in the addendum to the POR.
- CLECs requested the inclusion of other OSSs such as Verigate and LEX in the scope of this POR. SBC stated that interfaces such as these would be addressed in the POR designed to provide the Uniform and Enhanced OSS development plans.
- CLECs also requested the inclusion of loop provisioning test results prior to cooperative testing in the POR. SBC does not consider this process one that coincides with the enhancement to the existing Datagate or EDI interfaces and did not appear to be an OSS candidate for a future POR.
- The process to add DSL capability to a UNE-P service was requested by the CLECs to be included in the POR. SBC responded that the details associated with Line Sharing service arrangements were not known at this time and could not therefore be included with any specificity during the timeframe of this POR collaboration. SBC redirected the request for more information toward the Line Sharing Trial announced by SBC and scheduled to begin at the end of February.
- CLECs felt the POR should have included information on a series of collaborative workshops to be held. SBC responded that until the CLECs provided requests for enhancement to Datagate and EDI beyond those planned for in the POR, SBC had no feedback from the CLECs on which to base a need for workshops. As evidenced in this collaborative process, CLECs and SBC alike recommended additional meetings.

In addition to the specific items discussed above, the CLECs also requested a discussion in 2 other subject areas. SBC agreed to discuss these areas

Aggregate Planning Data Subject Area

On this subject, the CLECs were interested in understanding more about the DSL Planning Inquiry tool that operates in some of the SBC regions. SBC provided that this tool was not an OSS and was therefore an issue outside the scope of this POR. SBC mentioned this tool was map based and provided address specific and zip code level information. It is currently available in the SWB and PB/NB regions. SBC plans to provide a tool similar to this that will be available in all regions within a 12-month timeframe in concert with the Merger Conditions. CLECs also wanted to understand how they could request enhancements to the existing tool. SBC responded that since the tool was not an OSS, CLEC requests for enhancement should be discussed in the CLEC User Forum meetings or directly with their Account Manager.

Sample Data

While this item was introduced by the CLECs as a subject area they wanted to discuss, they suggested it was really a request for Loop Qualification data. The request was for SBC to provide a spread sheet of data pulled from backend systems containing information for 100 addresses in each of the 13 operating states. SBC responded to say it was not reasonable to provide information of this type on a blanketed basis for the purpose of assessing the quality of SBC's backend system information. SBC stated they will soon provide access to all backend system information that is mechanically available per the UNE Remand order. SBC agreed it was appropriate to share test or sample data with CLECs during joint testing as the CLEC was developing to either the Datagate or EDI interface. SBC does support this form of data request via a documented CLEC ioint testing plan. SBC also stated that currently the pre-gualification inquiry was in production in the Datagate interface and it could be used to gather sample data by the CLECs. SBC considers this request to be out of scope of the POR but did take the request under advisement. The CLECs felt strongly that this information was needed.

VII. Conclusion

SBC and the CLECs reached agreement upon 15 enhancements to the POR as originally submitted. These enhancements to the POR and the agreed upon deployment schedule for Datagate and EDI specific enhancement are attached as Exhibit I and II.

C

Ann M. Lopez Rhythms Links ILEC Manager 2680 Bishop Dr. Suite 124 San Ramon, CA 94583 Office: 925 244-0165 Cell: 925 202-7975

ALopez@Rhythms.net

```
> ----Original Message
> From: Lopez, Ann
> Sent: Tuesday, January 04, 2000 8:51 AM
> To: 'CHAPPELL, FOLNEY A (SWBT)'
> Co: Giron, Patrick
                Coordinated Testing at Loop Turn Over
> Subject:
> Importance: High
> Rodney,
> Prior to The holidays you were going to check to see if coordinated testing
> for loops is something that Rhythms can order. Please get back to me by
> Thursday 1/6/00 and let me know if we can start to order our loops and request
> a test before acceptance.
> Thank you,
> Ann
> Ann M. Lopez
> Rhythms Links / ACI Corp.
> 2680 Bishop Dr. Suite 124
> San Ramon, CA 94583
> ALouez@Rhythms.net
```